



Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Frequently Asked Questions Stage I Enhanced Vapor Recovery (EVR) Systems

Revised October 3, 2018

1. What is the most recent action that MassDEP has taken regarding Stage I vapor recovery systems?

On January 2, 2015, MassDEP promulgated revisions to its Stage I regulations (310 CMR 7.24(3)) that require the installation of Stage I Enhanced Vapor Recovery (EVR) systems on Gasoline Dispensing Facilities (GDFs) when a new Stage I system is installed, and require the phased-in upgrade of EVR systems at existing Stage I systems over a seven year period. For a description of the 2015 Stage I & II regulation revisions see “Fact Sheet: MassDEP’s Revised Stage I & II Regulations” posted on the MassDEP Stage I & II Vapor Recovery Program website.

<https://www.mass.gov/files/documents/2016/08/tv/s1and2-fs15.pdf>

2. What is a Stage I EVR system?

Stage I vapor controls prevent gasoline vapors from being released to the environment during product deliveries from fuel trucks to GDFs fuel storage tanks. Stage I Enhanced Vapor Recovery (EVR) refers to California Air Resources Board (CARB) certified Stage I systems that meet stricter emission control standards compared to Stage I Pre-EVR systems.

3. What is a Stage I Pre-EVR system?

Stage I “Pre-EVR” refers to older Stage I systems that were certified by CARB from 1976 to 2000.

4. What is the deadline to upgrade my Stage I Pre-EVR system to a Stage I EVR system?

The Stage I EVR upgrade deadline is **January 2, 2022**. GDFs with existing gasoline tanks with “**dual-point**” Stage I must install a Stage I EVR system by January 2, 2022. GDFs with existing gasoline tanks equipped with “**coaxial**” Stage I systems are not required to upgrade to Stage I EVR systems until the existing gasoline tanks are removed and replaced with new gasoline tanks.

5. How do I determine what kind of Stage I system is installed at my GDF?

You can determine if your GDF has a Stage I Pre-EVR system or Stage I EVR system, and a coaxial or dual-point system, by reviewing your most recently completed Stage I Form A, C, or D2. You may also consult with your Stage I installation contractor and/or Stage I testing company to determine what type of system you have.

6. What are the approved Stage I EVR systems that can be installed in Massachusetts?

There are two Stage I EVR systems approved for installation under MassDEP's Stage I regulations: "Stage I CARB EVR systems", and "Stage I Component EVR systems."

- **Stage I CARB EVR System** - a vapor balance system that includes all the approved CARB EVR components listed in one of the CARB EVR Certified Executive Orders listed in 310 CMR 7.24(3)(c), Table 1 (underground storage tanks) or Table 2 (aboveground storage tanks).
- **Stage I Component EVR System** - a vapor balance system that includes CARB EVR components from any of the CARB EVR Certified Executive Orders listed in 310 CMR 7.24(3)(c), Table 1 or Table 2.

7. Where can I obtain the CARB Stage I EVR executive orders?

The CARB Stage I (Phase I) EVR executive orders for underground tanks and aboveground tanks are available at the following link:

<https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders>

8. What are the Stage I requirements for newly installed GDFs or new Stage I system installations at existing GDFs?

Newly installed GDFs at locations where motor vehicle fuel has not been previously dispensed, or new Stage I systems at existing GDFs, must install a Stage I CARB EVR System or a Stage I Component EVR System.

9. What is required to upgrade an existing Stage I Pre-EVR system to a Stage I EVR system?

Consult with your Stage I testing company and Stage I installation contractor to determine the Stage I Pre-EVR components that need to be upgraded to Stage I EVR components.

10. If a Stage I Pre-EVR Component breaks or fails a Stage I test, do I have to replace the Pre-EVR component with an EVR Component?

Yes. If a Stage I Pre-EVR component breaks or fails an annual Stage I test, the component must be replaced with an EVR component so that by January 2, 2022 the GDF has a Stage I CARB EVR System or a Stage I Component EVR System. There are two exceptions:

- **Pre-EVR "slip-on" spill buckets** - GDFs may continue to install Pre-EVR "slip-on" spill buckets until January 2, 2022. After January 2, 2022, only EVR "screw-on" spill buckets may be installed.
- **Coaxial Stage I systems** - GDFs with coaxial Stage I systems may continue to use and repair/maintain the coaxial system until the underground storage tank (UST) is replaced, at which point the new UST is required to be equipped with a dual-point Stage I system with either a Stage I CARB EVR System or a Stage I Component EVR System.

11. Who can install or upgrade a Stage I Pre-EVR System to a Stage I EVR System?

MassDEP recommends contacting a qualified Stage I Installation contractor for Stage I EVR installation services.

12. When I upgrade to a Stage I EVR system are Stage I compliance tests required before I commence operation?

Yes. When the Stage I installation contractor has finished installing your Stage I EVR system, before commencing operation, a MassDEP registered Stage I testing company must perform all applicable Stage I compliance tests until all tests pass.

13. Does a Stage I certification Form need to be submitted to MassDEP when a Stage I EVR system is installed?

Yes. A **Stage I Form A** must be submitted to MassDEP within 7 business days of performing and passing the post-installation tests. When the Stage I testing company has passed all the applicable Stage I compliance tests, they will complete the testing company section of a Stage I Form A. The GDF Stage I responsible officials must then complete the Stage I Form A compliance questions and submit the Stage I Form A to MassDEP, Stage I Program, 1 Winter St., 7th floor, Boston, MA 02108.

14. If I have questions regarding my Stage I system how do I contact the MassDEP Stage I program?

The mailing address, phone number, and email address for MassDEP's Stage I Program are as follows:

MassDEP
Bureau of Air & Waste
Stage I Program
1 Winter Street, 7th floor
Boston, MA 02108

Phone: 617-556-1035, Extension 1
Email: aq.stage2@state.ma.us